

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

JUNE FLANNERY, individually and as the )  
Executor of the ESTATE OF KENNETH W. )  
FLANNERY, )  
Plaintiffs, )  
v. ) CAUSE NO. 1:13-cv-1714-RLY-MJD  
THE CITY OF INDIANAPOLIS; )  
OFFICER ALAN HOPKINS; )  
OFFICER MARSHALL HOSKINS; OFFICER )  
MARK FORD; JOHN DOE INDIANAPOLIS )  
POLICE DEPARTMENT OFFICERS, )  
Individually as Indianapolis )  
Metropolitan Police Department Officers; )  
SHERIFF JOHN R. LAYTON in his official )  
Capacity as the Sheriff of the Marion County )  
Sheriff's Department; )  
DEPUTY EARNEST WATERMAN; DEPUTY )  
PARKER SANDERS; JOHN DOE )  
MARION COUNTY SHERIFF'S )  
DEPARTMENTS DEPUTIES )  
Individually as Marion County )  
Sheriff Department Deputies; THE CITY OF )  
SOUTHPORT, INDIANA; )  
OFFICER KYLE MCCLINTOCK; JOHN DOE )  
CITY OF SOUTHPORT POLICE )  
DEPARTMENT OFFICERS, individually )  
as a City of Southport Police Department )  
Officers, )  
Defendants. )

**DEFENDANTS THE CITY OF SOUTHPORT, INDIANA AND OFFICER KYLE  
MCCLINTOCK'S PRELIMINARY EXHIBIT LIST**

Come now Defendants The City of Southport, Indiana and Officer Kyle McClintock, by counsel, and identify the following exhibits which may be introduced at the trial of this case:

1. All case reports created by the Indianapolis Metropolitan Police

Department and the Marion County Sheriff's Department concerning the arrest and transport of Kenneth Flannery.

2. Any transcribed statement of witnesses taken by any police agency.
3. Marion County Coroner's Officer Case File No.: MC-12-0840;
4. Indianapolis-Marion County Forensic Services Agency Lab Report No. LAB12-04762 and accompanying documents;
5. Kenneth Flannery In-Custody Death Investigation Detective Notice;
6. In-custody medical records of Kenneth Flannery dated 7/21/2012;
7. Scene Photos;
8. Autopsy Photos;
9. Any exhibits listed by any other parties;
10. Any exhibits exchanged during the course of discovery, including but not limited to, any document or tangible item identified in interrogatories, requests for production, requests for admissions, written or recorded statement and/or correspondence;
11. Any exhibits necessary for rebuttal or impeachment purposes;
12. Any exhibits necessary for the admission or the exclusion of another exhibit; and
13. Any exhibits yet to be discovered throughout the course of discovery.
14. Defendants reserve the right to supplement this list.

Respectfully submitted,

By: /s/ Paul T. Belch

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 24<sup>th</sup> day of February, 2014, a copy of this document was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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